



## Mars Khaimov Law, PLLC

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MEMO ENDORSED

### VIA ECF

Judge Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

*Colleen McMahon*

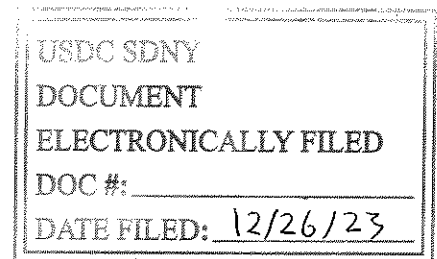
12/26/23

December 23, 2023

Re: 1:23-cv-04451-CM Toro v. Cowtown Boot Company

Status Letter and Request for Adjournment of Conference

Dear Judge McMahon,



Plaintiff's counsel submits this letter-motion to seek an Adjournment Initial Conference, currently set for January 4<sup>th</sup>, 2023 at 10:00 AM. Counsel has been unsuccessful thus far in attempts to communicate with Defendant. Plaintiff requests a 45-day adjournment for Defendant to appear and proposes to reschedule the conference for February 19th, 2024, or a date convenient to the Court. We will continue to contact Defendant informally, and if they fail to appear by the next date, will file for default. This is the second time relief is being requested.

We thank the Court for its attention and consideration in this matter.

Respectfully submitted,

/s/ Mars Khaimov  
Mars Khaimov, Esq.  
Attorney for Plaintiff